

RE: JOANNE B KERN

) Case No. 15 B 06980
)
Debtor) Chapter 13
)
) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

JOANNE B KERN

DAVID M SIEGEL

via Clerk's ECF noticing procedures

3805 STANDISH RD
MARENGO, IL 60152

Please take notice that on August 14, 2019 at 10:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on July 11, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On February 27, 2015 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Failure to turnover proceeds of personal injury claim to Trustee or to provide Trustee with a reasonable update regarding the status of the lawsuit.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603,
(312) 294-5900